United States Department of Agriculture
Food Safety and Inspection Service
Washington, D.C. 20250

Dr. Tony Zohrab
Director, Animal Products
MAF Regulatory Authority
Ministry of Agriculture and Forestry, New Zealand
ASB Bank House, 101-103 the Terrace
Post Office Box 2526
Wellington, New Zealand

DEC 18 2000

Dear Dr. Zohrab:

The Food Safety and Inspection Service conducted an on-site audit of New Zealand's meat inspection system from March 6 through 24, 2000. Enclosed is a copy of the final audit report. New Zealand's comments on the draft final audit report have been included as an attachment to this final audit report.

If you have any questions regarding the audit or need additional information, please contact Ms. Sally Stratmoen, Chief, Equivalence Branch, International Policy Division. Her telephone number is 202-720-3781 and her fax number is 202-690-4040.

Sincerely,

Sally Stratmoen

Mark Manis, Director
International Policy Division
Office of Policy, Program Development,
and Evaluation

Enclosure

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Food Safety And Inspection Service
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AUDIT REPORT FOR NEW ZEALAND
MARCH 6 THROUGH MARCH 24, 2000

INTRODUCTION

Background

This report reflects information that was obtained during an audit of New Zealand's meat inspection system from March 6 through March 24, 2000. Nine of the seventy-two establishments certified to export meat to the United States were audited. Five of these were slaughter establishments; three were conducting processing operations and one was cold storage.

The last audit of the New Zealand meat inspection system was conducted by a team of subject matter experts in March 1999. Nine establishments were audited and they were acceptable. The team reported several equivalence issues regarding HACCP and SSOP implementation, microbiological testing and inspection system control. The report was forwarded to New Zealand authorities and issues were discussed in a telephone-conference with New Zealand officials and International Policy Division, Washington prior to this visit.

During calendar year 1999, New Zealand exported 460, 325, 350 pounds of fresh beef and beef products, beef edible organs, veal, mutton and lamb products to the U.S. Port-of-entry rejections were 1, 930, 720 pounds (.4194%) for processing defects, miscellaneous defects, contamination, pathological defects, and transportation damage and missing shipping marks.

PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with New Zealand's national meat inspection officials to discuss oversight programs and practices, including enforcement and compliance activities. The second entailed an audit of a selection of records in the meat inspection headquarters facilities preceding the on-site visits. The establishments were selected randomly for records audits and on-site audits on the basis of several factors which included port of rejection rates, volume of export to the United States, and previous audit history . The third was conducted by on-site visits to establishments. The fourth was a visit to three laboratories, one performing analytical testing of field samples for the national residue testing program, and the others culturing field samples for the presence of microbiological contamination with *Salmonella and E. coli*. New Zealand uses private and establishment laboratories for microbiological testing.

Program effectiveness determinations focused on five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOPs), (2) animal disease controls, (3) residue controls, (4) slaughter/ processing controls, including the implementation and operation of Hazard Analysis and Critical Control Point (HACCP) systems and the *E. coli* testing program; and (5) enforcement controls, including the testing program for *Salmonella* species. New Zealand's inspection system was assessed by evaluating these five risk areas.

During all on-site establishment visits, the auditor evaluated the nature, extent, and degree to which findings impacted on food safety and public health, as well as overall program delivery. The auditor also determined if establishment and inspection system controls were in place. Establishments that do not have effective controls in place to prevent, detect and eliminate product contamination/adulteration are considered unacceptable and therefore ineligible to export products to the U.S., and are delisted accordingly by the country's meat inspection officials.

RESULTS AND DISCUSSION

Summary

Based on the performance of the individual establishments, New Zealand's "In-Plant Inspection System Performance" was evaluated as In-Plant System Controls In Place.

Effective inspection system controls were found to be in place in all nine establishments audited. Details of audit findings and observations, including compliance with HACCP, SSOPs, and testing programs for *Salmonella* and generic *E. coli* are discussed later in this report.

Entrance Meeting

On March 7, 2000, an entrance meeting was held at U.S. Embassy of New Zealand at Wellington, and was attended by Mr. David B. Young, Agriculture Attaché; Ms. Vinita Sharma, Agriculture Assistant of Foreign Agriculture Service; Mr. Donald Smart, Director, Review Staff; and Dr. Suresh Singh, International Audit Staff Officer of the Technical Service Center. Topics of discussion included the following:

1.Travel arrangements and itinerary within New Zealand.

2. Briefing of status of recent correspondence between FSIS and Ministry of Agriculture and Forestry (MAF).

On March 8, an entrance meeting was held at the Wellington offices of the Food Assurance Authority (FAA) of the Ministry of Agriculture and Forestry (MAF), New Zealand, and was attended by Dr.Tony Zohrab, Director Animal Products; Dr. Geoff Allen, Director Compliance and Investigation Group; Dr. Roger Cook, National Manager-Microbiology; Dr. John Lee, Market Access Counselor, North America; Ms. Judy Barker, Program Manager; Dr. Suresh Singh, International Audit Staff Officer and Mr. Donald Smart, Director Review Staff of the Food Safety and Inspection Service (FSIS) of the United States Department of Agriculture (USDA). Topics of discussion included the following:

1. Welcome by FAA-NZ and Structure of the New Zealand Meat Inspection Program.

2. National Microbiological DataBase of New Zealand (NZ).

3. Previous Audit Reports and Washington Correspondence.

Headquarters Audit

There had been no changes in the organizational structure or upper levels of inspection staffing since the last U.S. audit of the New Zealand inspection system in March 1999. To gain an accurate overview of the effectiveness of inspection controls, FSIS requested that the audits of the individual establishments be led by the compliance inspection officials who normally conduct the periodic reviews and audits for compliance with U.S. specifications. The FSIS auditor (hereinafter called "the auditor") observed and evaluated the process.

The auditor conducted a review of inspection system documents pertaining to the establishments listed for records review. This records review was conducted at the headquarters on March 8 and 9. The records review focused primarily on food safety hazards and included the following:

- Internal review reports and compliance check/list
- Compliance visits to establishments that were certified to export to the U. S.
- Training records for inspectors
- Records such as generic labels, and animal raising claims.
- New laws and implementation documents such as regulations, notices, directives and guidelines.
- Sampling and laboratory analyses for residues.
- Pathogen reduction and other food safety initiatives such as SSOPs, HACCP programs, generic *E. coli* testing and *Salmonella* testing.
- Sanitation, slaughter and processing inspection procedures and standards.
- Control of products from livestock with conditions such as tuberculosis, cysticercosis, etc., and of inedible and condemned materials and veterinary coverage
- Export product inspection and control including export certificates.
- Enforcement records including examples of criminal prosecution, consumer complaints, recalls, seizure and control of noncompliant product, and withholding, suspending, withdrawing inspection services from or delisting an establishment that is certified to export product to the United States.

No concerns arose as a result of the examination of these documents.

Government Oversight

All inspection veterinarians and inspectors in establishments certified by New Zealand as eligible to export meat products to the United States were full-time, MAF Verification Agency and Asure NZ employees, receiving no remuneration from either industry or establishment. Asure inspectors are occasionally contracted out to the establishment to perform quality assurance functions. This use of Asure employees by establishments continues to be an equivalence issue. MAF Food Assurance Authority (MAFFAA) and MAF Verification Agency (MAFVA) are both within the Ministry of Agriculture and Forestry. Asure New Zealand (ANZ) is a State Owned Enterprise (SOE) that is accountable to the Minister of State Owned Enterprises. Most of the field Veterinary inspection officials are employed by MAFVA; most of the central government officials are employed by MAFFAA; and inspectors in the establishments are employed by Asure NZ. All three agencies work under guidelines of Memorandum of Understanding.

Establishment Audits

Seventy-two establishments were certified to export meat products to the United States at the time this audit was conducted. Nine establishments were visited for on-site audits. In all establishments visited, both New Zealand inspection system controls and establishment system controls were in place to prevent, detect and control contamination and adulteration of products.

Laboratory Audits

During the laboratory audits, emphasis was placed on the application of procedures and standards that were equivalent to U.S. requirements. Information about the following risk areas was also collected:

1. Government oversight of accredited, approved, and private laboratories .
2. Intra-laboratory quality assurance procedures, including sample handling.
3. Methodology.

The AgriQuality New Zealand Limited Residues Laboratory in Upper Hutt, NZ was audited on March 22, 2000. Effective controls were in place for sample handling and frequency, timely analysis, data reporting, tissue matrices for analysis, equipment operation, print outs, minimum detection levels, recovery frequency, percent recoveries, and corrective actions. The methods used for the analyses were acceptable.

New Zealand's microbiological testing for *Salmonella and E. coli* was being performed in private and contract-approved laboratories. Two of these, the Biotest Laboratory and Canterbury Meat Packers Ltd. Laboratory in Hamilton and Ashburton were audited. The auditor determined that the system met the criteria established for the use of private laboratories under FSIS's Pathogen Reduction/HACCP rule. These criteria are:

1. The laboratories were accredited by third party MILAB accrediting organization with oversight by the government.
2. The laboratories had properly trained personnel, suitable facilities and equipment, a written quality assurance program, and reporting and record-keeping capabilities.
3. Results of analyses were being reported to the government and establishment.

Establishment Operations by Establishment Number

The following operations were being conducted in the nine establishments:

Beef and lamb slaughter, cutting, boning and grinding - two establishments (ME 78, and ME 52)
Beef and lamb boning and canning – one establishment (PH 134)
Beef and Lamb cutting, boning and grinding – one establishment (PH 173)
Beef slaughter, cutting and boning – three establishments (ME 23, ME 70 and ME 199)
Beef, Lamb, Goat and Veal slaughtering – one establishment (ME 130)
Cold Storage-all species – one establishment (S237 previously ME 122)

SANITATION CONTROLS

Based on the on-site audits of establishments, New Zealand's inspection system had controls in place for water potability, hand washing facilities, sanitizers, pest control program, temperature control, lighting, and ventilation. Basic establishment facilities, condition of facilities and equipment, product protection and handling and establishment sanitation programs were acceptable.

Sanitation Standard Operating Procedures (SSOPs)

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment A).

The SSOPs were found to meet the basic FSIS regulatory requirements. In establishments ME52 and ME130, establishment quality assurance takes care of pre-operational sanitation checks and SSOP is part of the establishment's HACCP.

Cross-Contamination

1. Fecal contamination was observed on a few beef carcasses in establishment ME23, carcasses were railed out immediately and MAF Verification veterinary officials took corrective actions.
2. A belt on the conveyor in the boning room of establishment ME 78 was broken/cracked in several places and torn on the edges (unhygienic-hard to clean). MAF Verification and establishment officials discussed and agreed to replace the belt.
3. Peeling paint and rust spots were observed in the carcass cooler in establishment ME 52. MAF Verification, establishment officials and the Compliance auditor discussed this issue and corrective action will be taken.

Product Handling and Storage

Meat products were found to be stored in good condition but facilities (floor, doors and lockers) in establishment S237 were in need of repair. This was an old slaughter establishment that had been converted to cold storage. Establishment officials agreed to repair and modify the facilities and agreed on a time schedule with MAF Verification and Compliance authorities.

Personnel Hygiene and Practices

In all establishments, employees were observed to follow good personnel hygiene practices.

ANIMAL DISEASE CONTROLS

New Zealand's inspection system had controls in place to ensure adequate animal identification, ante-mortem and post-mortem inspection procedures and dispositions, condemned and restricted product control, and procedures for sanitary handling of returned and rework product.

No classification records are kept for reasons of condemnations of organs (liver heart and lungs) in establishment ME 70.

There were reported to have been no outbreaks of animal diseases with public-health significance since the previous U.S. audit. MAF Biosecurity Authority (MAFBA) publishes a Directory and other booklets, which covers biosecurity and animal health issues. This is of special interest to all those with a stake in New Zealand's animal production industries.

RESIDUE CONTROLS

New Zealand's National Residue Testing Plan for 2000 was being followed, and was on schedule. The New Zealand inspection system had adequate controls in place to ensure compliance with sampling and reporting procedures and storage and use of chemicals. The Animal Products Act of 1999 reforms the New Zealand law that regulates the production and processing of animal materials and products to manage associated risks including drug and chemical residues.

SLAUGHTER/PROCESSING CONTROLS

Except as noted below, the New Zealand's inspection system had controls in place to ensure adequate product protection and processed product controls.

HACCP Implementation

All establishments approved to export meat products to the U.S. are required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program and met FSIS requirements. The data collection instrument used accompanies this report (Attachment B).

Testing for Generic *E. coli*

New Zealand has adopted the FSIS regulatory requirements for *E. coli* testing.
All of the establishments audited were required to meet the basic FSIS regulatory requirements for generic *E. coli* testing, and were audited and evaluated according to the criteria employed in the U.S. domestic inspection program and criteria determined by protocol of study and approved by FSIS for equivalency determination. The data collection instrument used accompanies this report (Attachment C), which indicates that recording of test results in establishments ME23, ME70, ME78, ME130, and ME134 were not done in a table or process control chart or graph.

The *E. coli* testing programs were found to meet the basic FSIS regulatory requirements for generic *E. coli* testing with the exception of the following equivalent measures:

1. TESTING STRATEGY:
    - Testing frequency is based on National Microbiological DataBase with at least five carcasses per week at three sites regardless of production volume.
    - The predominant class of animals slaughtered in an establishment is sampled.

2. SAMPLING SITES:
   - New Zealand samples cattle at three sites: flank, brisket, and outside hind leg. The sample sites include the sites most likely to be contaminated with fecal contamination.
   - The sample sites encompass a large enough surface area to ensure that the effectiveness of the slaughter process controls will be evaluated.
   - The sample sites provide the same probability of detecting the presence of fecal contamination as the sites chosen by FSIS.

3. SAMPLING TOOLS:
   - New Zealand uses a swab-sampling tool. The swab is a traditional or generally recognized sample collection tool for sampling for *E. coli* on meat or poultry surfaces.
   - The tool is sensitive enough to gather *E. coli* present on the sample site.
   - The tool does not contaminate the surfaces of the carcass.

4. ANALYTICAL METHODS:
   - The method is a quantitative method of analysis.
   - The method is approved by the AOAC International .

ENFORCEMENT CONTROLS

Inspection System Controls

The New Zealand inspection system controls [ante-and post-mortem inspection procedures and dispositions, control of restricted product and inspection samples, control and disposition of dead, dying, diseased or disabled animals, boneless meat re-inspection, shipment security, including shipment between establishments, prevention of commingling of product intended for export to the United States with domestic product, monitoring and verification of establishment programs and controls (including taking and documentation of corrective actions under HACCP plans), inspection supervision and documentation, the importation of only eligible livestock or poultry from other countries (i.e., only from eligible countries and certified establishments within those countries), and the importation of only eligible meat or poultry products from other counties for further processing] were in place and effective in ensuring that products produced by the establishment were wholesome, unadulterated, and properly labeled.

Adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

Testing for *Salmonella* Species

All of the establishments audited were required to meet the basic FSIS regulatory requirements for *Salmonella* testing, and were evaluated according to the criteria employed in the U.S. domestic inspection program and criteria used in the equivalency determination. The data collection instrument used accompanies this report (Attachment D).

The *Salmonella* testing programs were found to meet the basic FSIS regulatory requirements.

New Zealand has adopted the FSIS regulatory requirements for *Salmonella* testing with exception of the following equivalent measures :

1. SAMPLE COLLECTOR: Establishment Takes Samples.
    - MAF develops a written, national sampling plan and enforces a national *Salmonella* testing program for sample collection and processing that is followed in all New Zealand establishments that export meat products to the United States.
    - Sample collection procedures are directly reviewed via specific tasks that are assigned to a trained on- site veterinarian from MAF Verification Agency. The accredited laboratory and the government accreditation authority (MILAB) are also responsible for ensuring correct sampling procedures. MAF Food (Compliance) performs periodic audits of MILAB and MAF Verification, including the oversight and monitoring activities of the sample collector. MAF Food (Animal Products) has mandatory access to all microbiological test results, including *Salmonella* test results. The on-site MAF Verification Agency Veterinarian also has direct access to all *Salmonella* test results.
    - MAF uses *Salmonella* test results to monitor the performance of each establishment over time.
    - The government of New Zealand (MAF) takes immediate action any time an establishment fails to meet a *Salmonella* performance standard.

2. LABORATORIES: Private laboratories analyze samples.
    - The laboratories are government, independent non-government, or establishment laboratories that are all accredited by the government accreditation authority, MILAB. MILAB, in turn, is audited bi-annually by MAF Food (Compliance). MAF Food (Animal Products) sets MILAB standards. All laboratories are assessed to ISO 25 standards. MILAB accreditation and responsibilities are audited bi-annually and at the request of MAF Food (Animal Products) by MAF Food (Compliance). The Inter-Laboratory Comparison Program is a government program that conducts monthly proficiency tests with each accredited laboratory and is accredited to ISO 9000 and ISO Guide 43. The accreditation program is mandated, established, and regulated by MAF Food (Animal Products).
    - All accredited laboratories have a formal program which ensures that laboratory personnel are properly trained, that there are suitable facilities and equipment, that there is a written quality assurance program, and that there are adequate reporting and record-keeping facilities.

Test results are reported directly to MAF inspection personnel and it was observed that test results were also reported to the establishment.

3. SAMPLING TOOLS.
    - The swab tool method of sample collection is used. The swab tool is an internationally recognized sample collection tool for sampling Salmonella on meat or poultry products, is sensitive enough to gather an adequate quantity of the *Salmonella* that are present at the sample sites, and does not contaminate surfaces of the carcasses.

4. SAMPLING TECHNIQUES: Time of Collection of Samples.
    - Samples are taken at the end of the slaughter or production process from the same carcass (one side for *E. coli* and one side for *Salmonella)* and prior to the carcass being cut and/or packaged.

Species Verification Testing

At the time of this audit, New Zealand was not exempt from the species verification testing requirements. The auditor verified that species verification testing was being conducted in accordance with FSIS requirements.

Monthly Reviews

The National Compliance and Investigation Group equivalent to our Domestic Review were performing the in-depth reviews and audits. National Assessors domiciled throughout the country report to the Director, Compliance and Investigation of MAFFFA. Specially trained senior technical supervisors of MAFVA conduct the monthly review based on the risk performance program called Performance Based Verification (PBV). Most of the team leaders of MAFVA are veterinarians with at least 5-15 years of experience. All the establishments visited were not being reviewed routinely on a monthly basis because of PBV performance.

The internal review program consists of both audits by the CIG and the IQA group within MAFVA. Audits may be announced or unannounced. The records of audited establishments were kept in the inspection offices of the individual establishments, and copies were also kept in the central MAF offices in Wellington, and were routinely maintained on file for a minimum of three years.

Establishments found during the course of the internal review program to be seriously out of compliance with the U.S. requirements may be delisted for U.S. export or be subject to other sanctions. Delistment may be imposed by either MAFVA staff or by the CIG. The party imposing this sanction performs in-depth audits prior to relisting. Before relisting is permitted, all non-compliances must either have been completely resolved and appropriate preventive action taken to prevent recurrence. This may include programmed management plans where longer-term corrective actions are required. Where MAFVA is involved in such sanctions, they are subject to periodic audits by CIG.

After observing the internal reviewers' activities in the field, the auditor was confident in their professionalism, thoroughness, and knowledge of U.S. requirements, and in the effectiveness of New Zealand's internal review program as a whole in the HACCP environment.

Enforcement Activities

Enforcement activities are carried out with a Memorandum of Understanding between all Government agencies involved with all aspects of the meat production and distribution system. MAF-Food Assurance Authority has the sole power to initiate all enforcement actions.

Exit Meeting

An exit meeting was conducted in Wellington on March 23, 2000. The New Zealand participants were Dr. Tony Zohrab, Director, Animal Products; Dr. Geoff Allen, Director Compliance and Investigation; Dr. Roger Cook, National Manager Microbiology; Mr. Neil Kiddey, Manager, Compliance and Investigation; and Ms. Judy Barker, Program Manager HACCP from MAFFA. Other participants were Mr. David Young, Agriculture Attaché, American Embassy; Mr. Donald Smart, Director Review Staff; and Dr. Suresh Singh, International Audit Staff Officer of FSIS.

The following topics were discussed:

1. Audit findings and observations of the auditor:

a. Fecal contamination was observed on a few carcasses in establishment 23, carcasses were railed out immediately and MAF Verification Veterinary officials took corrective actions.
b. A belt on the conveyor in the boning room of establishment ME 78 was broken/cracked in several places. MAF Verification and establishment officials discussed and agreed to replace the belt.
c. Peeling paint and rust spots were observed in the carcass cooler in establishment ME 52. MAF Verification, establishment officials and the Compliance auditor discussed this issue and planned to take corrective action.
d. Facilities: doors, floor and lockers were in need of repair in establishment S 237. Establishment officials agreed to repair and modify the facilities and agreed on time schedule with MAF Verification and Compliance authorities. These are discussed above in this report in the respective risk areas.

2. Integration and control of meat inspection system-MOU guidelines between different agencies (MAFFA, MAFVA, and ASURE) involved in meat inspection.

3. Monthly Supervision of establishments by MAFVA. A supervisor routinely on a monthly basis was not reviewing all the establishments. MAF authorities explained that supervisory visits are done on the basis of the Performance Based Verification (PBV) inspection system. The internal review program was not applied equally to both export and non-export establishments. MAF authorities explained that New Zealand's meat export market is very large so they put more resources in the export market than domestic market. This is explained in this report in the monthly review section.

4. Leasing and contracting of Asure inspectors to the establishments. Asure (meat) inspectors are sometimes leased and contracted out to the establishments to do certain quality control functions in the establishment. This seems a conflict of interest issue. This matter is subject to discussion between MAF Food officials and the International Policy Division (IPD) of FSIS. MAF Food has provided an explanatory letter to IPD and is awaiting further response to this.

5. FSIS requirement for certification of cold storage and warehouses/freezers was re-emphasized and NZ officials agreed to comply.

CONCLUSION

The inspection system of New Zealand was found to have effective controls to ensure that product destined for export to the United States was produced under conditions equivalent to those which FSIS requires in domestic establishments. Nine establishments were audited and all were acceptable. The deficiencies encountered during the on-site establishment audits were adequately addressed to the auditor's satisfaction.

Dr. Suresh P. Singh (signed) Dr. Suresh P. Singh
International Audit Staff Officer

ATTACHMENTS

A. Data collection instrument for SSOPs
B. Data collection instrument for HACCP programs
C. Data collection instrument for *E. coli* testing.
D. Data collection instrument for *Salmonella* testing
E. Laboratory audit form
F. Individual Foreign Establishment Audit Forms
G. Written Foreign Country's Response to the Draft Final Audit Report

Attachment A

Data Collection Instrument for SSOPs

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written SSOP program.
2. The procedure addresses pre-operational sanitation.
3. The procedure addresses operational sanitation.
4. The pre-operational procedures address (at a minimum) the cleaning of food-contact surfaces of facilities, equipment, and utensils.
5. The procedure indicates the frequency of the tasks.
6. The procedure identifies the individuals responsible for implementing and maintaining the activities.
7. The records of these procedures and any corrective action taken are being maintained on a daily basis.
8. The procedure is dated and signed by the person with overall on-site authority.

The results of these evaluations were as follows:

Est. #	1.Written program addressed	2. Pre-op sanitation addressed	3. Oper. sanitation addressed	4. Contact surfaces addressed	5. Fre-quency addressed	6. Respons-ible indiv. Identified	7. Docu-mentation done daily	8. Dated and signed
23	√	√	√	√	√	√	√	√
52	√	√	√	√	√	√	√	√
70	√	√	√	√	√	√	√	√
78	√	√	√	√	√	√	√	√
119	√	√	√	√	√	√	√	√
130	√	√	√	√	√	√	√	√
134	√	√	√	√	√	√	√	√
173	√	√	√	√	√	√	√	√
237	√	√	√	√	√	√	√	√

Internal compliance audit documentations records of establishments 18, 23, 39, 54, 84, 87, 100, 104, 118, 122, 128, 366 and 504 were audited and met all the requirements of FSIS.

Attachment B

Data Collection Instrument for HACCP Programs

Each of the establishments approved to export meat products to the U.S. (except Est.237, which was a cold-storage facility) was required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. The establishment has a flow chart that describes the process steps and product flow.
2. The establishment had conducted a hazard analysis.
3. The analysis includes food safety hazards likely to occur.
4. The analysis includes the intended use of or the consumers of the finished product(s).
5. There is a written HACCP plan for each product where the hazard analysis revealed one or more food safety hazard(s) reasonably likely to occur.
6. All hazards identified in the analysis are included in the HACCP plan; the plan lists a CCP for each food safety hazard identified.
7. The HACCP plan specifies critical limits, monitoring procedures, and the monitoring frequency performed for each CCP.
5. The plan describes corrective actions taken when a critical limit is exceeded.
6. The HACCP plan was validated using multiple monitoring results.
7. The HACCP plan lists the establishment's procedures to verify that the plan is being effectively implemented and functioning and the frequency for these procedures.
11. The HACCP plan's record-keeping system documents the monitoring of CCPs and/or includes records with actual values and observations.
12. The HACCP plan is dated and signed by a responsible establishment official.

The results of these evaluations were as follows:

Est. #	1. Flow diagram	2. Hazard analysis conducted	3. All hazards identified	4. Use & users included	5. Plan for each hazard	6. CCPs for all hazards	7. Monitoring is specified	8. Corr. actions are described	9. Plan validated	10.Adequate verific. Procedures	11.Adequate documentation	12. Dated and signed
23	√	√	√	√	√	√	√	√	√	√	√	√
52	√	√	√	√	√	√	√	√	√	√	√	√
70	√	√	√	√	√	√	√	√	√	√	√	√
78	√	√	√	√	√	√	√	√	√	√	√	√
119	√	√	√	√	√	√	√	√	√	√	√	√
130	√	√	√	√	√	√	√	√	√	√	√	√
134	√	√	√	√	√	√	√	√	√	√	√	√
173	√	√	√	√	√	√	√	√	√	√	√	√

Internal compliance audit documentation records of establishments 18, 23, 39, 54, 84, 87, 100, 104, 118, 122, 128, 366 and 504 were audited and met all the requirements of FSIS.

Attachment C

Data Collection Instrument for Generic *E. coli* Testing

Each establishment (except Est. 237, which was a cold-storage facility) was evaluated to determine if the basic FSIS regulatory requirements for generic *E. coli* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written procedure for testing for generic *E. coli.*
2. The procedure designates the employee(s) responsible to collect the samples.
3. The procedure designates the establishment location for sample collecting.
4. The sample collection is done on the predominant species being slaughtered.
5. The sampling is done at the frequency specified in the procedure.
6. The equivalent carcass site and collection methodology (Swab) is being used for sampling.
7. The carcass selection is following the random method specified in the procedure or is being taken randomly.
8. The laboratory is analyzing the sample using an AOAC Official Method .
9. The results of the tests are not being recorded on a process control chart but on a table form showing the most recent test results.
10. The test results are being maintained for at least 12 months.

Est. #	1.Written procedure	2. Sampler designated	3.Sampling location given	4. Predomin. species sampled	5. Sampling at the req'd freq.	6. Proper site or method	7. Sampling is random	8. Using AOAC method	9. Chart or graph of results	10. Results are kept at least 1 yr
23	√	√	√	√	no	√	√	√	no	√
52	√	√	√	√	√	√	√	√	√	√
70	√	√	√	√	√	√	√	√	no	√
78	√	√	√	√	√	√	√	√	no	√
119	√	√	√	√	√	√	√	√	√	√
130	√	√	√	√	√	√	√	√	no	√
134	√	√	√	√	√	√	no	√	no	√
173	√	√	√	√	√	√	√	√	√	√

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit: 18, 23, 39, 54, 84, 87, 100, 104, 118, 122, 128, 366, and 504.

Attachment D

Data Collection Instrument for *Salmonella* testing

Each slaughter establishment was evaluated to determine if the basic FSIS regulatory requirements for *Salmonella* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. Salmonella testing is being done in this establishment.

2. Carcasses are being sampled.

3. Ground product is being sampled.

4. The samples are being taken randomly.

5. The equivalent carcass site and method is being used for sampling.

6. Establishments in violation are not being allowed to continue operations.

The results of these evaluations were as follows:

Est. #	*1. Testing as required*	*2. Carcasses are sampled*	3. Ground product is sampled	4. Samples are taken randomly	5. Proper site and/or proper prod.	6. Violative est's stop operations
23	√	√	N/A	√	√	√
52	√	√	√	√	√	√
70	√	√	N/A	√	√	√
78	√	√	N/A	√	√	√
119	√	√	N/A	√	√	√
130	√	√	N/A	√	√	√

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit: 18, 23, 39, 54, 84, 87, 100, 104, 118, 122, 128, 366 and 504. All audited records met the USDA requirements in all establishments.

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
INTERNATIONAL PROGRAMS

FOREIGN COUNTRY LABORATORY REVIEW

REVIEW DATE	NAME OF FOREIGN LABORATORY
03-22-2000	Agri Quality New Zealand Ltd.

FOREIGN GOV'T AGENCY	CITY & COUNTRY	ADDRESS OF LABORATORY
MAF_AGRI_QUALITY	Upper Hutt, New Zealand	Ward Street, Upper Hutt, New Zealand

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL
Dr.S.P.Singh	Dr. Pat Poletti and Mrs.Lynette Dey

	Residue Code/Name ▶			100	200											
	REVIEW ITEMS	ITEM #														
SAMPLING PROCEDURES	Sample Handling	01	EVALUATION CODE	A	A											
	Sampling Frequency	02		A	A											
	Timely Analyses	03		A	A											
	Compositing Procedure	04		O	O											
	Interpret Comp Data	05		O	O											
	Data Reporting	06		A	A											
ANALYTICAL PROCEDURES	Acceptable Method	07	EVALUATION CODE	A	A											
	Correct Tissue(s)	08		A	A											
	Equipment Operation	09		A	A											
	Instrument Printouts	10		A	A											
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	EVALUATION CODE	A	A											
	Recovery Frequency	12		A	A											
	Percent Recovery	13		A	A											
	Check Sample Frequency	14		A	A											
	All analyst w/Check Samples	15		A	A											
	Corrective Actions	16		A	A											
	International Check Samples	17		A	A											
REVIEW PROCEDURES	Corrected Prior Deficiencies	18	EVAL. CODE	A	A											
OTHER REVIEW FINDINGS		19	EVAL. CODE													
		20														

SIGNATURE OF REVIEWER S.P. Singh

DATE 03/22/2000

Designed on FormFlow Software

United States Department of Agriculture | Food Safety And Inspection Service | Technical Service Center | Suite 300, Landmark Center 1299 Farnam Street Omaha, NE 68102

Questions for Auditing Microbiology Laboratories

General: Date Audited—03-10-20000----------

Name & location of lab: Canterbury Meat Packers Ltd.,Seafield Rd.Ashburton, NZ

Private or gov't lab: Private-Establishment's lab

How & when was accreditation obtained: Milab Approval Limited, P.O.Box 345,Wellington, NZ-Accreditation agency-1999

How & how often is accreditation maintained: all the time

When and how is payment for analysis provided: Not applicable (N/A)-company owned.

Are results released before payment is received: Yes

What are the qualifications of the analyst(s) performing the individual tasks within a method: B.S.in Microbiology and another with Technology degree.

What are the qualifications of the direct supervisor of the analyst: B.S. in Microbiology.

Methodology for HACCP *Salmonella* samples

Does this lab analyze HACCP *Salmonella* samples-yes

How are HACCP *Salmonella* samples received & recorded: Received from the establishment" Quality Control and recorded In the record book.

Are HACCP *Salmonella* samples analyzed on the day of receipt: Yes

What method is used for HACCP *Salmonella* samples: USDA

Is it a qualitative method (i.e. +/- result): Yes

Are HACCP ground beef samples analyzed for *Salmonella:N/A*

What is the size of the ground beef test portion:N/A

What buffer is used : Peptone

Sponge samples for *Salmonella-yes*

Poultry rinsates for *Salmonella-N/A*

Salmonella ground beef sample homogenates-N/A

What is the formulation of the Buffered Peptone Water-Difco ready made

What analytical controls are used for *Salmonella* analyses(i.e: control cultures, etc.)

Are they employed for each sample set-yes

How and to whom are HACCP *Salmonella* results reported-Directly to Veterinary Verification agency by phone and weekly report.

Are "check" samples periodically used to test the proficiency of the lab and analysts for *Salmonella* testing-yes

Methodology for HACCP generic *E. coli* samples (in-plant or other private labs)

Does this lab analyze HACCP generic *E. coli* samples-yes

How is HACCP *E. coli* samples received & recorded- by QC and recorded in Logbook.

IS HACCP *E. coli* samples analyzed on the day of receipt-yes

What method is used for HACCP generic *E. coli* samples-Petrifilm

Is it a quantitative method-yes

What buffer is used :Peptone Buffer

E. coli sponge samples- No, but dry swabs –3 and wet swabs-3

Poultry rinsates for generic *E. coli-N/A*

What analytical controls are used: positive controls

Are they employed for each sample set: yes

How are HACCP *E. coli* results calculated and/or expressed-numbers colony forming units (cfu) per cm sq.

How are *E. coli* results recorded: in table form in LogBook

How and to whom are HACCP *E. coli* results reported-Establishment Managers and MAF-Veterinary Verification agency.

Are "check" samples periodically used to test the proficiency of the lab and analysts for generic *E. coli* testing-yes

USDA United States Department of Agriculture | Food Safety And Inspection Service | Technical Service Center | Suite 300, Landmark Center 1299 Farnam Street Omaha, NE 68102

Questions for Auditing Microbiology Laboratories

General: Date Audited—03-15-20000----------

Name & location of lab: Biotest Laboratories,Hillcrest,Hamilton, NZ

Private or gov't lab: Private lab

How & when was accreditation obtained: Milab Approval Limited, P.O.Box 345,Wellington, NZ-Accreditation agency-1992

How & how often is accreditation maintained: every two years

When and how is payment for analysis provided: after results are reported by client meat company.

Are results released before payment is received: Yes

What are the qualifications of the analyst(s) performing the individual tasks within a method: M.S.in Microbiology and another with Technology degree.

What are the qualifications of the direct supervisor of the analyst: M.S. in Microbiology.

Methodology for HACCP *Salmonella* samples

Does this lab analyze HACCP *Salmonella* samples-yes

How are HACCP *Salmonella* samples received & recorded: Received from the establishment" by express mail and recorded In the record book.

Are HACCP *Salmonella* samples analyzed on the day of receipt: Yes

What method is used for HACCP *Salmonella* samples: USDA-AOAC

Is it a qualitative method (i.e. +/- result): Yes

Are HACCP ground beef samples analyzed for *Salmonella:N/A*

What is the size of the ground beef test portion:N/A

What buffer is used : Peptone

Sponge samples for *Salmonella-Swab no sponge*

Poultry rinsates for *Salmonella-N/A*

Salmonella ground beef sample homogenates-N/A

What is the formulation of the Buffered Peptone Water-Difco ready made

What analytical controls are used for *Salmonella* analyses(i.e. control cultures, etc.)

Are they employed for each sample set-yes

How and to whom are HACCP *Salmonella* results reported-Directly to Veterinary Verification agency and establishment clients by phone and weekly report.

Are "check" samples periodically used to test the proficiency of the lab and analysts for *Salmonella* testing-yes

Methodology for HACCP generic *E. coli* samples (in-plant or other private labs)

Does this lab analyze HACCP generic *E. coli* samples-yes

How is HACCP *E. coli* samples received & recorded- by QC and recorded in Logbook.

IS HACCP *E. coli* samples analyzed on the day of receipt-yes

What method is used for HACCP generic *E. coli* samples-Petrifilm

Is it a quantitative method-yes

What buffer is used :Peptone Buffer

E. coli sponge samples- No, but dry swabs –3 and wet swabs-3

Poultry rinsates for generic *E. coli-N/A*

What analytical controls are used: positive controls

Are they employed for each sample set: yes

How are HACCP *E. coli* results calculated and/or expressed-numbers colony forming units (cfu) per cm sq.

How are *E. coli* results recorded: in table form in LogBook

How and to whom are HACCP *E. coli* results reported-Establishment Managers and MAF-Veterinary Verification agency.

Are "check" samples periodically used to test the proficiency of the lab and analysts for generic *E. coli* testing-yes

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
INTERNATIONAL PROGRAMS

FOREIGN PLANT REVIEW FORM

REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY / COUNTRY
03-16-2000	ME-23, AFFCO NZ Ltd.	COUNTRY: New Zealand

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION
Dr.S.P.Singh	Dr. Ziggy Bojarski	[X] Acceptable [ ] Acceptable/Re-review [ ] Unacceptable

CODES (Give an appropriate code for each review item listed below)
A - Acceptable M - Marginally Acceptable U - Unacceptable N - Not Reviewed O - Does not apply

1. CONTAMINATION CONTROL		Cross contamination prevention	28 A	Formulations	55 A
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing	29 A	Packaging materials	56 A
Water potability records	01 A	Product handling and storage	30 A	Laboratory confirmation	57 A
Chlorination procedures	02 A	Product reconditioning	31 A	Label approvals	58 A
Back siphonage prevention	03 A	Product transportation	32 A	Special label claims	59 A
Hand washing facilities	04 A	**(d) ESTABLISHMENT SANITATION PROGRAM**		Inspector monitoring	60 A
Sanitizers	05 A	Effective maintenance program	33 A	Processing schedules	61 A
Establishments separation	06 A	Preoperational sanitation	34 A	Processing equipment	62 A
Pest --no evidence	07 A	Operational sanitation	35 A	Processing records	63 A
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 A
Pest control monitoring	09 A	**2. DISEASE CONTROL**		Filling procedures	65 A
Temperature control	10 A	Animal identification	37 A	Container closure exam	66 A
Lighting	11 A	Antemortem inspec. procedures	38 A	Interim container handling	67 A
Operations work space	12 A	Antemortem dispositions	39 A	Post-processing handling	68 A
Inspector work space	13 A	Humane Slaughter	40 A	Incubation procedures	69 A
Ventilation	14 A	Postmortem inspec. procedures	41 A	Process. defect actions -- plant	70 A
Facilities approval	15 A	Postmortem dispositions	42 A	Processing control -- inspection	71 A
Equipment approval	16 A	Condemned product control	43 A	**5. COMPLIANCE/ECON. FRAUD CONTROL**	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 A	Export product identification	72 A
Over-product ceilings	17 A	Returned and rework product	45 A	Inspector verification	73 A
Over-product equipment	18 A	**3. RESIDUE CONTROL**		Export certificates	74 A
Product contact equipment	19 A	Residue program compliance	46 A	Single standard	75 A
Other product areas *(inside)*	20 A	Sampling procedures	47 A	Inspection supervision	76 M
Dry storage areas	21 A	Residue reporting procedures	48 A	Control of security items	77 A
Antemortem facilities	22 A	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 A
Outside premises	24 A	**4. PROCESSED PRODUCT CONTROL**		"Equal to" status	80 A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 A	Imports	81 A
Personal dress and habits	25 A	Boneless meat reinspection	52 A	SSOP	82 A
Personal hygiene practices	26 A	Ingredients identification	53 A	HACCP	83 A
Sanitary dressing procedures	27 M	Control of restricted ingredients	54 A		

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY / COUNTRY
	03-16-2000	ME-23, AFFCO NZ Ltd.	Horotiu / New Zealand

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION
Dr.S.P.Singh	Dr. Ziggy Bojarski	[X] Acceptable [ ] Acceptable/ Re-review [ ] Unacceptable

COMMENTS:

27-M=Fecal contamination was observed on two carcasses. They were railed out for trimming at trim station and corrective action was taken by MAF Verification Agency Veterinarians.

76-M=Inspection supervision was not done according to CFR-9-327.2-iv-A. Supervision of local inspection staff and periodic review of the establishment are done on risk basis .

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE

FOREIGN PLANT REVIEW FORM

REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
03-21-2000	ME 52, Richmond Pacific	Hastings
		COUNTRY: New Zealand

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION
Dr.S.P.Singh	Mr.Lindsay Nichols	[X] Acceptable [ ] Acceptable/Re-review [ ] Unacceptable

CODES (Give an appropriate code for each review item listed below)
A - Acceptable M - Marginally Acceptable U - Unacceptable N - Not Reviewed O - Does not apply

1. CONTAMINATION CONTROL		Cross contamination prevention	28 A	Formulations	55 A
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing	29 A	Packaging materials	56 A
Water potability records	01 A	Product handling and storage	30 A	Laboratory confirmation	57 A
Chlorination procedures	02 A	Product reconditioning	31 A	Label approvals	58 A
Back siphonage prevention	03 A	Product transportation	32 A	Special label claims	59 A
Hand washing facilities	04 A	**(d) ESTABLISHMENT SANITATION PROGRAM**		Inspector monitoring	60 A
Sanitizers	05 A	Effective maintenance program	33 M	Processing schedules	61 A
Establishments separation	06 A	Preoperational sanitation	34 M	Processing equipment	62 A
Pest --no evidence	07 A	Operational sanitation	35 A	Processing records	63 A
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 A
Pest control monitoring	09 A	**2. DISEASE CONTROL**		Filling procedures	65 A
Temperature control	10 A	Animal identification	37 A	Container closure exam	66 A
Lighting	11 A	Antemortem inspec. procedures	38 A	Interim container handling	67 A
Operations work space	12 A	Antemortem dispositions	39 A	Post-processing handling	68 A
Inspector work space	13 A	Humane Slaughter	40 A	Incubation procedures	69 A
Ventilation	14 A	Postmortem inspec. procedures	41 A	Process. defect actions -- plant	70 A
Facilities approval	15 A	Postmortem dispositions	42 A	Processing control -- inspection	71 A
Equipment approval	16 A	Condemned product control	43 A	**5. COMPLIANCE/ECON. FRAUD CONTROL**	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 A	Export product identification	72 A
Over-product ceilings	17 A	Returned and rework product	45 A	Inspector verification	73 A
Over-product equipment	18 A	**3. RESIDUE CONTROL**		Export certificates	74 A
Product contact equipment	19 A	Residue program compliance	46 A	Single standard	75 A
Other product areas *(inside)*	20 A	Sampling procedures	47 A	Inspection supervision	76 M
Dry storage areas	21 A	Residue reporting procedures	48 A	Control of security items	77 A
Antemortem facilities	22 A	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 A
Outside premises	24 A	**4. PROCESSED PRODUCT CONTROL**		"Equal to" status	80 A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 A	Imports	81 A
Personal dress and habits	25 A	Boneless meat reinspection	52 A	SSOP	82 A
Personal hygiene practices	26 A	Ingredients identification	53 A	HACCP	83 A
Sanitary dressing procedures	27 A	Control of restricted ingredients	54 A		

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY Wellington
	03-21-2000	ME 52, Richmond Pacific	COUNTRY New Zealand

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION
Dr.S.P.Singh	Mr.Lindsay Nichols	[X] Acceptable [ ] Acceptable/ Re-review [ ] Unacceptable

COMMENTS:

33-M- Peeling paint noticed in carcass coolers, and rust observed on the product racks in the coolers. Cow- observed outside in the entrance hallway. The lead auditor noticed and reported to the plant management for corrective actions.

34. M -Preoperation sanitation check is done by establishment under SSOP and HACCP. MAF verification Agency verifies the program according to Performance Based Verification (PBV) schedule.

76-M-Inspection supervision is not done monthly.

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE

FOREIGN PLANT REVIEW FORM

REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY / COUNTRY
03-14-2000	ME-70, Canterbury Meat Packers ltd.	Blenheim / New Zealand

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION
Dr.S.P.Singh	Mr.Neil Kiddey.	[X] Acceptable [ ] Acceptable/ Re-review [ ] Unacceptable

CODES (Give an appropriate code for each review item listed below)
A – Acceptable M – Marginally Acceptable U – Unacceptable N – Not Reviewed O – Does not apply

1. CONTAMINATION CONTROL		Cross contamination prevention	28 A	Formulations	55 O
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing	29 A	Packaging materials	56 A
Water potability records	01 A	Product handling and storage	30 A	Laboratory confirmation	57 A
Chlorination procedures	02 A	Product reconditioning	31 A	Label approvals	58 A
Back siphonage prevention	03 A	Product transportation	32 A	Special label claims	59 O
Hand washing facilities	04 A	**(d) ESTABLISHMENT SANITATION PROGRAM**		Inspector monitoring	60 A
Sanitizers	05 A	Effective maintenance program	33 A	Processing schedules	61 O
Establishments separation	06 A	Preoperational sanitation	34 A	Processing equipment	62 O
Pest --no evidence	07 A	Operational sanitation	35 A	Processing records	63 O
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 O
Pest control monitoring	09 A	**2. DISEASE CONTROL**		Filling procedures	65 O
Temperature control	10 A	Animal identification	37 A	Container closure exam	66 O
Lighting	11 A	Antemortem inspec. procedures	38 A	Interim container handling	67 O
Operations work space	12 A	Antemortem dispositions	39 A	Post-processing handling	68 O
Inspector work space	13 A	Humane Slaughter	40 A	Incubation procedures	69 O
Ventilation	14 A	Postmortem inspec. procedures	41 A	Process. defect actions -- plant	70 O
Facilities approval	15 A	Postmortem dispositions	42 A	Processing control -- inspection	71 O
Equipment approval	16 A	Condemned product control	43 A	**5. COMPLIANCE/ECON. FRAUD CONTROL**	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 A	Export product identification	72 A
Over-product ceilings	17 A	Returned and rework product	45 A	Inspector verification	73 A
Over-product equipment	18 A	**3. RESIDUE CONTROL**		Export certificates	74 A
Product contact equipment	19 A	Residue program compliance	46 A	Single standard	75 A
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Dry storage areas	21 A	Residue reporting procedures	48 A	Control of security items	77 A
Antemortem facilities	22 A	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 A
Outside premises	24 A	**4. PROCESSED PRODUCT CONTROL**		"Equal to" status	80 A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 A	Imports	81 A
Personal dress and habits	25 A	Boneless meat reinspection	52 A	SSOP	82 A
Personal hygiene practices	26 A	Ingredients identification	53 A	HACCP	83 A
Sanitary dressing procedures	27 A	Control of restricted ingredients	54 A		

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
INTERNATIONAL PROGRAMS

FOREIGN PLANT REVIEW FORM

REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
03-10-2000	ME-78, Canterbury Meat Packers Ltd.	ASHBURTON
		COUNTRY: NEW ZEALAND

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION
Dr.S.P.Singh	Mr. Neil Kiddey	[X] Acceptable [ ] Acceptable/Re-review [ ] Unacceptable

CODES (Give an appropriate code for each review item listed below)
A - Acceptable M - Marginally Acceptable U - Unacceptable N - Not Reviewed O - Does not apply

1. CONTAMINATION CONTROL		Cross contamination prevention	28 A	Formulations	55 O
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing	29 A	Packaging materials	56 A
Water potability records	01 A	Product handling and storage	30 A	Laboratory confirmatio:	57 A
Chlorination procedures	02 A	Product reconditioning	31 A	Label approvals	58 A
Back siphonage prevention	03 A	Product transportation	32 A	Special label claims	59 O
Hand washing facilities	04 A	**(d) ESTABLISHMENT SANITATION PROGRAM**		Inspector monitoring	60 A
Sanitizers	05 A	Effective maintenance program	33 A	Processing schedules	61 O
Establishments separation	06 A	Preoperational sanitation	34 A	Processing equipment	62 O
Pest --no evidence	07 A	.Operational sanitation	35 A	Processing records	63 O
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 O
Pest control monitoring	09 A	**2. DISEASE CONTROL**		Filling procedures	65 O
Temperature control	10 A	Animal identification	37 A	Container closure exam	66 O
Lighting	11 A	Antemortem inspec. procedures	38 A	Interim container handling	67 O
Operations work space	12 A	Antemortem dispositions	39 A	Post-processing handling	68 O
Inspector work space	13 A	Humane Slaughter	40 A	Incubation procedures	69 O
Ventilation	14 A	Postmortem inspec. procedures	41 A	Process. defect actions -- plant	70 O
Facilities approval	15 A	Postmortem dispositions	42 A	Processing control -- inspection	71 O
Equipment approval	16 A	Condemned product control	43 A	**5. COMPLIANCE/ECON. FRAUD CONTROL**	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 A	Export product identification	72 A
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Over-product equipment	18 A	**3. RESIDUE CONTROL**		Export certificates	74 A
Product contact equipment	19 M	Residue program compliance	46 A	Single standard	75 A
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Antemortem facilities	22 A	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 A
Outside premises	24 A	**4. PROCESSED PRODUCT CONTROL**		"Equal to" status	80 A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 A	Imports	81 A
Personal dress and habits	25 A	Boneless meat reinspection	52 A	SSOP	82 A
Personal hygiene practices	26 A	Ingredients identification	53 O	HACCP	83 A
Sanitary dressing procedures	27 A	Control of restricted ingredients	54 O		

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
	03-10-2000	ME-78, Canterbury Meat Packers Ltd.	ASHBURTON
			COUNTRY NEW ZEALAND

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION
Dr.S.P.Singh	Mr. Neil Kiddey	[X] Acceptable [ ] Acceptable/ Re-review [ ] Unacceptable

COMMENTS:

M-19= Boning Room--Belt in boning room broken at places and edges torn (Unhygienic and hard to clean).

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
INTERNATIONAL PROGRAMS

FOREIGN PLANT REVIEW FORM

REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
03-22-2000	ME-119, Riverlands Manawatu Ltd.	[illegible]
		COUNTRY: NEW ZEALAND

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION
Dr.S.P.SINGH.	Dr.Patrick Poletti	[X] Acceptable [ ] Acceptable/Re-review [ ] Unacceptable

CODES (Give an appropriate code for each review item listed below)
A - Acceptable M - Marginally Acceptable U - Unacceptable N - Not Reviewed O - Does not apply

1. CONTAMINATION CONTROL		Cross contamination prevention	28 A	Formulations	55 O
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Establishments separation	06 A	Preoperational sanitation	34 A	Processing equipment	62 O
Pest --no evidence	07 A	Operational sanitation	35 A	Processing records	63 O
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 O
Pest control monitoring	09 A	**2. DISEASE CONTROL**		Filling procedures	65 O
Temperature control	10 A	Animal identification	37 A	Container closure exam	66 O
Lighting	11 A	Antemortem inspec. procedures	38 A	Interim container handling	67 O
Operations work space	12 A	Antemortem dispositions	39 A	Post-processing handling	68 O
Inspector work space	13 A	Humane Slaughter	40 A	Incubation procedures	69 O
Ventilation	14 A	Postmortem inspec. procedures	41 A	Process. defect actions -- plant	70 O
Facilities approval	15 A	Postmortem dispositions	42 A	Processing control -- inspection	71 O
Equipment approval	16 A	Condemned product control	43 A	**5. COMPLIANCE/ECON. FRAUD CONTROL**	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 A	Export product identification	72 A
Over-product ceilings	17 A	Returned and rework product	45 A	Inspector verification	73 A
Over-product equipment	18 A	**3. RESIDUE CONTROL**		Export certificates	74 A
Product contact equipment	19 A	Residue program compliance	46 A	Single standard	75 A
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Antemortem facilities	22 A	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 A
Outside premises	24 A	**4. PROCESSED PRODUCT CONTROL**		"Equal to" status	80 A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 A	Imports	81 A
Personal dress and habits	25 A	Boneless meat reinspection	52 A	SSOP	82 A
Personal hygiene practices	26 A	Ingredients identification	53 A	HACCP	83 A
Sanitary dressing procedures	27 A	Control of restricted ingredients	54 O		

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE

FOREIGN PLANT REVIEW FORM

REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
03-20-2000	130, Progressive Gisborne Ltd.	GISBORNE
		COUNTRY: NEW ZEALAND

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION
Dr. S.P.Singh	Mr Lindsey Ni chols	[X] Acceptable [ ] Acceptable/ Re-review [ ] Unacceptable

CODES (Give an appropriate code for each review item listed below)
A - Acceptable M - Marginally Acceptable U - Unacceptable N - Not Reviewed O - Does not apply

1. CONTAMINATION CONTROL		Cross contamination prevention	28 A	Formulations	55 O
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing	29 A	Packaging materials	56 A
Water potability records	01 A	Product handling and storage	30 A	Laboratory confirmation	57 A
Chlorination procedures	02 A	Product reconditioning	31 A	Label approvals	58 O
Back siphonage prevention	03 A	Product transportation	32 A	Special label claims	59 O
Hand washing facilities	04 A	**(d) ESTABLISHMENT SANITATION PROGRAM**		Inspector monitoring	60 A
Sanitizers	05 A	Effective maintenance program	33 A	Processing schedules	61 O
Establishments separation	06 A	Preoperational sanitation	34 M	Processing equipment	62 O
Pest --no evidence	07 A	Operational sanitation	35 A	Processing records	63 O
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 O
Pest control monitoring	09 A	**2. DISEASE CONTROL**		Filling procedures	65 O
Temperature control	10 A	Animal identification	37 A	Container closure exam	66 O
Lighting	11 A	Antemortem inspec. procedures	38 A	Interim container handling	67 O
Operations work space	12 A	Antemortem dispositions	39 A	Post-processing handling	68 O
Inspector work space	13 A	Humane Slaughter	40 A	Incubation procedures	69 O
Ventilation	14 A	Postmortem inspec. procedures	41 A	Process. defect actions -- plant	70 O
Facilities approval	15 A	Postmortem dispositions	42 A	Processing control -- inspection	71 O
Equipment approval	16 A	Condemned product control	43 A	**5. COMPLIANCE/ECON. FRAUD CONTROL**	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 A	Export product identification	72 A
Over-product ceilings	17 A	Returned and rework product	45 A	Inspector verification	73 A
Over-product equipment	18 A	**3. RESIDUE CONTROL**		Export certificates	74 A
Product contact equipment	19 A	Residue program compliance	46 A	Single standard	75 A
Other product areas *(inside)*	20 A	Sampling procedures	47 A	Inspection supervision	76 M
Dry storage areas	21 A	Residue reporting procedures	48 A	Control of security items	77 A
Antemortem facilities	22 A	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 A
Outside premises	24 A	**4. PROCESSED PRODUCT CONTROL**		"Equal to" status	80 A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 O	Imports	81 A
Personal dress and habits	25 A	Boneless meat reinspection	52 O	SSOP	82 A
Personal hygiene practices	26 A	Ingredients identification	53 O	HACCP	83 A
Sanitary dressing procedures	27 A	Control of restricted ingredients	54 O		

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY GISBORNE
	03-20-2000	130, Progressive Gisborne Ltd.	COUNTRY NEW ZEALAND

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION
Dr. S.P.Singh	Mr Lindsey Ni chols	[X] Acceptable [ ] Acceptable/ Re-review [ ] Unacceptable

COMMENTS:

M-34 = Pre-operation sanitation check was done under HACCP program daily by company officials. MAF Verification agency verifies sanitation check once a month according to task assignment under their Performance Based Inspection (PBV)System. Assure inspectors who are assigned to establishment for slaughter inspection and MAF Verification agency veterinarians do not perform Pre-operation sanitation check under SSOP. SSOP is included in the HACCP Plan.

M-76 = Inspection Supervision is not on monthly basis, they are done according to PBV.

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE

FOREIGN PLANT REVIEW FORM

REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
03-15-2000	PH-134, McCallum Industries Ltd.	HENDERSON
		COUNTRY: NEW ZEALAND

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION
Dr.S.P.Singh	Dr.Ziggy Bojarski	[X] Acceptable [ ] Acceptable/Re-review [ ] Unacceptable

CODES (Give an appropriate code for each review item listed below)
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Hand washing facilities	04 A	(d) ESTABLISHMENT SANITATION PROGRAM		Inspector monitoring	60 A
Sanitizers	05 A	Effective maintenance program	33 A	Processing schedules	61 A
Establishments separation	06 A	Preoperational sanitation	34 A	Processing equipment	62 A
Pest --no evidence	07 A	Operational sanitation	35 A	Processing records	63 A
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 A
Pest control monitoring	09 A	2. DISEASE CONTROL		Filling procedures	65 A
Temperature control	10 A	Animal identification	37 A	Container closure exam	66 A
Lighting	11 A	Antemortem inspec. procedures	38 A	Interim container handling	67 A
Operations work space	12 A	Antemortem dispositions	39 A	Post-processing handling	68 A
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(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 A	Export product identification	72 A
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Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 A
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL		"Equal to" status	80 A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 A	Imports	81 A
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Sanitary dressing procedures	27 A	Control of restricted ingredients	54 A		

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE

FOREIGN PLANT REVIEW FORM

REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
03-13-2000	PH-173, ANZCO Green Island Ltd.	DUNEDIN
		COUNTRY: NEW ZEALAND

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION
Dr.S.P.Singh	Mr.Dudley Morrison	[X] Acceptable [ ] Acceptable/ Re-review [ ] Unacceptable

CODES (Give an appropriate code for each review item listed below)
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1. CONTAMINATION CONTROL		Cross contamination prevention	28 A	Formulations	55 A
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Chlorination procedures	02 A	Product reconditioning	31 A	Label approvals	58 A
Back siphonage prevention	03 A	Product transportation	32 A	Special label claims	59 O
Hand washing facilities	04 A	**(d) ESTABLISHMENT SANITATION PROGRAM**		Inspector monitoring	60 A
Sanitizers	05 A	Effective maintenance program	33 A	Processing schedules	61 A
Establishments separation	06 A	Preoperational sanitation	34 A	Processing equipment	62 A
Pest --no evidence	07 A	Operational sanitation	35 A	Processing records	63 A
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 O
Pest control monitoring	09 A	**2. DISEASE CONTROL**		Filling procedures	65 O
Temperature control	10 A	Animal identification	37 O	Container closure exam	66 O
Lighting	11 A	Antemortem inspec. procedures	38 O	Interim container handling	67 O
Operations work space	12 A	Antemortem dispositions	39 O	Post-processing handling	68 O
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Ventilation	14 A	Postmortem inspec. procedures	41 O	Process. defect actions -- plant	70 A
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Equipment approval	16 A	Condemned product control	43 A	**5. COMPLIANCE/ECON. FRAUD CONTROL**	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 A	Export product identification	72 A
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Antemortem facilities	22 O	Approval of chemicals, etc.	49 A	Shipment security	78 A
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Outside premises	24 A	**4. PROCESSED PRODUCT CONTROL**		"Equal to" status	80 A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 A	Imports	81 A
Personal dress and habits	25 A	Boneless meat reinspection	52 A	SSOP	82-A
Personal hygiene practices	26 A	Ingredients identification	53 A	HACCP	83-A
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U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE

FOREIGN PLANT REVIEW FORM

REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY
03-21-2000	S-237, (ME122), Richmond Ltd.	Napier
		COUNTRY: NEW ZEALAND

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION
Dr.S.P.Singh	Mr.Lindsay Nichols	[X] Acceptable [ ] Acceptable/ Re-review [ ] Unacceptable

CODES (Give an appropriate code for each review item listed below)
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1. CONTAMINATION CONTROL		Cross contamination prevention	28 O	Formulations	55 O
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Sanitizers	05 O	Effective maintenance program	33 M	Processing schedules	61 O
Establishments separation	06 O	Preoperational sanitation	34 O	Processing equipment	62 O
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Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 O
Pest control monitoring	09 A	**2. DISEASE CONTROL**		Filling procedures	65 O
Temperature control	10 A	Animal identification	37 O	Container closure exam	66 O
Lighting	11 A	Antemortem inspec. procedures	38 O	Interim container handling	67 O
Operations work space	12 A	Antemortem dispositions	39 O	Post-processing handling	68 O
Inspector work space	13 A	Humane Slaughter	40 O	Incubation procedures	69 O
Ventilation	14 A	Postmortem inspec. procedures	41 O	Process. defect actions -- plant	70 O
Facilities approval	15 A	Postmortem dispositions	42 O	Processing control -- inspection	71 O
Equipment approval	16 A	Condemned product control	43 O	**5. COMPLIANCE/ECON. FRAUD CONTROL**	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 O	Export product identification	72 O
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Over-product equipment	18 A	**3. RESIDUE CONTROL**		Export certificates	74 O
Product contact equipment	19 A	Residue program compliance	46 O	Single standard	75 O
Other product areas *(inside)*	20 M	Sampling procedures	47 O	Inspection supervision	76 O
Dry storage areas	21 A	Residue reporting procedures	48 O	Control of security items	77 O
Antemortem facilities	22 O	Approval of chemicals, etc.	49 O	Shipment security	78 O
Welfare facilities	23 A	Storage and use of chemicals	50 O	Species verification	79 O
Outside premises	24 A	**4. PROCESSED PRODUCT CONTROL**		"Equal to" status	80 A
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 O	Imports	81 O
Personal dress and habits	25 A	Boneless meat reinspection	52 O	SSOP	A
Personal hygiene practices	26 A	Ingredients identification	53 O		
Sanitary dressing procedures	27 O	Control of restricted ingredients	54 O		

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE	ESTABLISHMENT NO. AND NAME	CITY / COUNTRY
	03-21-2000	S-237, (ME122), Richmond Ltd.	COUNTRY NEW ZEALAND

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL	EVALUATION
Dr.S.P.Singh	Mr.Lindsay Nichols	[X] Acceptable [ ] Acceptable/ Re-review [ ] Unacceptable

COMMENTS:

M20 and M33= Damaged floor, lockers and doors were observed in this warehouse facility.This was Slaughter establishment ME-122 and now converted as cold storage facility.Effective maintenance program needed for the facility.

Ministry of Agriculture and Forestry, New Zealand
Te Manatu Ahuwhenua, Ngaherehere, Aotearoa

File Ref: M-USA000

31 October 2000

Mr Mark Manis
Director
International Policy Division
Office of Policy, Program Evaluation
USDA
1400 Independence Avenue SW
Washington DC 20205 - 3700
UNITED STATES OF AMERICA

Dear Mr Manis

AUDIT REPORT FOR NEW ZEALAND

Thank you for the opportunity to provide comment on the Draft Final Audit Report for New Zealand for the audit conducted 6-24 March 2000.

I would like to express my overall satisfaction with the conclusion to this report and consider it to be a true reflection of the performance of the New Zealand programme.

The majority of New Zealand's comments are editorial in nature. They are appended to this letter and we envisage they will add to the accuracy and overall value of the report.

Yours sincerely

Dr Tony Zohrab
Director (Animal Products)

New Zealand Comments on the Draft Final Audit Report

Page 1: Protocol, last sentence of the first paragraph. Delete the word "The" from the beginning of the last sentence.

Page 3: Government Oversight. MAF Food Assurance Authority (MAF FAA) and MAF Verification Agency (MAF VA) are both within the Ministry of Agriculture and Forestry. Asure (ANZ) is a State Owned Enterprise (SOE) which is accountable to the Minister of State Owned Enterprises.

Page 5: SSOPs, second paragraph, last sentence. The establishments are ME 52 and ME 130.

Page 6: Testing for Generic *E. coli.* Establishments are ME 23, ME 70, ME 78, ME 139, and PH 134.

Page 8: 1. SAMPLE COLLECTOR: Second bullet point, second sentence should read: "The accredited laboratory and the government accreditation authority (MILAB)..."
2. LABORATORIES: First bullet point, first sentence should read: "The laboratories are government, independent non-government or establishment laboratories that are all accredited by the government accreditation authority, MILAB.

Page 9: Monthly Reviews, first paragraph, second sentence, suggested wording: "National Assessors domiciled throughout the country report to the Director, Compliance and Investigation of MAF FAA."
First paragraph, second sentence. Team Leaders do not conduct monthly reviews. Suggest that it should read: "Specially trained and calibrated senior technical supervisors of MAF VA conduct...."

Page 9: Monthly Reviews. Second paragraph, suggest that the first two sentences be replaced with: "The internal review programme consists of both audits by the CIG and the IQA group within MAF VA. Audits may be announced or unannounced."

Page 9: Monthly Reviews – third paragraph. The delistment process is incorrectly described. Suggest that the paragraph be replaced with the following: "Establishments found during the course of the internal review programme to be seriously out of compliance with the US requirements may be delisted for US export or be subject to other sanctions. Delistment may be imposed by either MAFVA staff or by the CIG. The party imposing this sanction performs in-depth audits prior to relisting. Before relisting is permitted all non-compliances must either have been completely resolved and appropriate preventative action taken to prevent recurrence. This may include programmed management plans where longer-term corrective actions are required. Where MAFVA is involved in such sanctions, they are subject to periodic audits by CIG."

Page 9: Enforcement Activities. Second line. Upper case G in Government.

Page 9: Mr Neil Kiddey's title is "Manager, Compliance and Investigation".

Page 10: Second to last sentence. Comment: One reason there is more internal review resource put into the export programme is to satisfy the US requirements.

Page 10: 4.Replace the last sentence with: "This matter is subject to discussion between MAF Food officials and the International Policy Division (IPD) of FSIS. MAF Food has provided an explanatory letter to IPD and is awaiting further response to this."

Page 10: 5. Suggest the word "certification" be replaced with "formal listing".